

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

ODIT NARAIN SEENARAIN,  
and,  
LUTCHMIN CYNTHY SEENARAIN,  
Defendants.

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CRIMINAL NO.

19-411  
United States Courts  
Southern District of Texas  
FILED

MAY 30 2019

David J. Bradley, Clerk of Court

**CRIMINAL INDICTMENT**

THE GRAND JURY CHARGES THAT:

**INTRODUCTION**

At all times material to this indictment:

1. The term “child” means a person who has not attained the age of 16 years pursuant to Title 18, United States Code, Section 1204(b)(1).
2. The term “parental right,” with respect to a child, means the right to physical custody of the child –
  - (A) whether joint or sole (and includes visiting rights); and
  - (B) whether arising by operation of law, court order, or legally binding agreement of the parties, as defined by Title 18, United States Code, Section 1204(b)(2).

**COUNT ONE**  
**Conspiracy**

A. **OBJECT OF THE CONSPIRACY**

On or about September 1, 2017, and continuing through the date of the return of this indictment, in the Southern District of Texas and elsewhere, Defendants,

**ODUIT NARAIN SEENARAIN,**  
and,  
**LUTCHMIN CYNTHY SEENARAIN,**

conspired and agreed with each other, and others known and unknown to the grand jury, to (a) remove children, Minor Child #1 (MC1) and Minor Child #2 (MC2), from the United States and retain the children (who had been in the United States) outside the United States with the intent to obstruct the lawful exercise of parental rights of Chloe Rotisha Hunter, the mother, in violation of Title 18, United States Code, Section 1204.

**B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED**

The object of the conspiracy was to be accomplished, in substance, as follows:

1. The Defendants did remove MC1 and MC2 from Houston Texas, Southern District of Texas, to the country of Guyana to obstruct the lawful exercise of parental rights of the mother, Chloe Rotisha Hunter.
2. The Defendants did and continue to retain the child in Guyana to obstruct the lawful exercise of Chloe Rotisha Hunter's parental rights.
3. The Defendants did and continue to deprive Chloe Rotisha Hunter of physical custody of MC1 and MC2 in direct contradiction of Court Orders issued by Brazoria County District Court, located in the State of Texas, United States of America.

**C. OVERT ACTS**

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, Defendants, **ODUIT NARAIN SEENARAIN** and **LUTCHMIN CYNTHY SEENARAIN** committed various overt acts within the Southern District of Texas and elsewhere, including but not limited to:

1. In the spring of 2018, **ODUIT NARAIN SEENARAIN** and **LUTCHMIN CYNTHY SEENARAIN** started communicating with Chloe Rotisha Hunter to convince her to allow MC1 and MC2 to travel to Guyana for the summer of 2018.
2. On approximately June 8, 2018, **LUTCHMIN CYNTHY SEENARAIN** arrived in Houston to pick up MC1 and MC2. On June 15, 2018, **LUTCHMIN CYNTHY SEENARAIN**, flew with MC1 and MC2 outside of the United States via United Airlines flight 1457 (Houston IAH to Port of Spain POS) and Caribbean Airlines Flight 601 (POS to Georgetown GEO, Guyana).
3. **LUTCHMIN CYNTHY SEENARAIN**, prior to leaving for Guyana, promised Chloe Rotisha Hunter that **LUTCHMIN CYNTHY SEENARAIN** would bring the children back to the United States on August 15, 2018. **LUTCHMIN CYNTHY SEENARAIN** failed to return MC1 and MC2 on that date or anytime thereafter.
4. On June 26, 2018, **ODUIT NARAIN SEENARAIN**, called Chloe Rotisha Hunter and ridiculed her for allowing MC1 and MC2 to travel to Guyana and informed Chloe Rotisha Hunter that MC1 and MC2 would never return to the United States.
5. In the fall of 2018, MC1 and MC2 are enrolled in school in Guyana by **ODUIT NARAIN SEENARAIN** contrary to his original agreement to have MC1 and MC2 return to the United States.
6. In February of 2019, **ODUIT NARAIN SEENARAIN** is arrested in Guyana on an unrelated matter. While he is in custody, **LUTCHMIN CYNTHY SEENARAIN** takes custody of MC1 and MC2 for several days.
7. On approximately April 8, 2019, **ODUIT NARAIN SEENARAIN**, filed for custody of MC1 and MC2 in Guyana contrary to the Brazoria County, Texas court order of

custody.

**8. OUDIT NARAIN SEENARAIN** continues to retain MC1 and MC2 in Guyana.

**All in violation of Title 18, United States Code, Section 371.**

**COUNT TWO**  
**International Parental Kidnapping**

From on and or about June 15, 2018, and continuing through the date of the return of this indictment, within the Southern District of Texas, and elsewhere,

**OUDIT NARAIN SEENARAIN,**  
and,  
**LUTCHMIN CYNTHY SEENARAIN,**

defendants herein, did knowingly remove MC1, a child under the age of 16, from the United States and did knowingly retain said child (who had been in the United States) outside the United States with intent to obstruct the lawful exercise of parental rights by the mother of MC1, Chloe Rotisha Hunter.

**All in violation of Title 18, United States Code, Sections 1204(a) and 2.**

**COUNT THREE**  
**International Parental Kidnapping**

From on and or about June 15, 2018, and continuing through the date of the return of this indictment, within the Southern District of Texas, and elsewhere,

**OUDIT NARAIN SEENARAIN,**  
and,  
**LUTCHMIN CYNTHY SEENARAIN,**

defendants herein, did knowingly remove MC2, a child under the age of 16, from the United States and did knowingly retain said child (who had been in the United States) outside the United

States with intent to obstruct the lawful exercise of parental rights by the mother of MC2, Chloe Rotisha Hunter.

**All in violation of Title 18, United States Code, Sections 1204(a) and 2.**

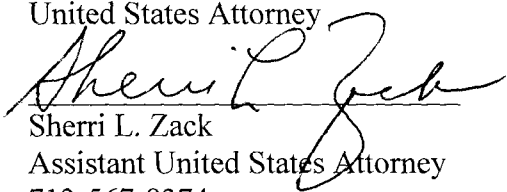
A True Bill:

Original Signature on File

Grand Jury Foreperson

RYAN K. PATRICK  
United States Attorney

BY:

  
Sherri L. Zack  
Assistant United States Attorney  
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